

EXHIBIT 26



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Michael Dell'Angelo
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Re: *The Broadway League v. Telsey & the Teamsters, et al.*,
1:17-cv-09515-GHW-KHP (S.D.N.Y.)

Dear Michael:

I write in response to your February 7th letter requesting additional informal discovery concerning the producers referenced in the Complaint. As an initial matter, we again note that these paragraphs discuss communications your clients have had with producers, and so, you could simply have asked them. Thus, your hyperbole about “unmasking” producers is just empty rhetoric, which does not appear to serve any productive purpose.

Nonetheless, you have asked for additional information about paragraph 103 of the Complaint, which, again, refers to the defendants’ presentation of the Deal Memo and Personal Services Agreement, not any conduct of any specific producer. Of course, defendants know the full universe of producers and general managers to whom they presented these documents or otherwise made demands. But, in terms of the basis for the allegation, we understand that the Deal Memo referenced in the first three sentences of paragraph 103 was presented at least to the same producer/general manager referred to in paragraph 56, which we previously identified, namely 321 Theatrical Management – Marcia Goldberg and Nina Essman. The Personal Services Agreement referenced in the last sentence of paragraph 103 was presented at least to 101 Productions, Ltd. – Jeff Wilson, Wendy Orshan; Foresight Theatrical – Aaron Lustbader; Joey Parnes Productions – Joey Parnes, John Johnson, and Sue Wagner; and Bespoke Theatricals – Amy Jacobs, Devin Keudell, and Nathan Gehan.

As to paragraph 49, we have already identified the relevant producers as “any and all producers that signed a collective bargaining agreement with the Teamsters.” This would include all the Hollywood producers that signed on to a collective bargaining agreement with the Teamsters through membership with The Alliance of Motion Picture and Television Producers, or otherwise. With respect to this paragraph of the complaint, we do not intend to make a further disclosure at this time.

Sincerely,

/s/ Colin Kass